

December 3, 2019

Frank Gardner  
United States Environmental Protection Agency- Region 1  
5 Post Office Square, Suite 100  
OSRR7-2  
Boston, MA 02109-3912

Dear Mr. Gardner:

The Town of Stratford, CT is applying for an EPA Brownfields Community-Wide Assessment Grant in the amount of \$250,000.

**1) Applicant Identification:** Town of Stratford, 2725 Main Street, Stratford, Connecticut 06615

**2) Funding Requested**

- a. **Assessment Grant Type:** Community-wide
- b. **Federal Funds Requested**
  - i. \$250,000
  - ii. A Site-specific Assessment Grant waiver of the \$200,000 limit is *not* being requested
- c. **Contamination:** Hazardous Substances (\$200,000) and Petroleum (\$50,000)

**3) Location:** Stratford, Fairfield County, Connecticut

**4) Property Information for Site-Specific Proposals:** Not applicable

**5) Contacts:**

- a. **Project Director:**  
Kelly F. Kerrigan, Environmental Conservation Superintendent  
Conservation Division, 550 Patterson Avenue, Stratford, CT 06614  
203-385-4006, [kkerrigan@townofstratford.com](mailto:kkerrigan@townofstratford.com)
- b. **Chief Executive/Highest Ranking Elected Official:**  
Mayor Laura R. Hoydick  
2725 Main Street, Stratford, CT 06614  
203-385-4001, [lhoydick@townofstratford.com](mailto:lhoydick@townofstratford.com)

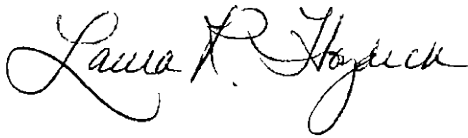
**6) Population:** 51,384 as of the 2010 Census

7) **Other Factors Checklist:** None of the “Other Factors,” as presented in the Brownfields Assessment Grant Guidelines are applicable to the proposed assessment project other than the following:

- a. The Priority Site(s) is in a federally designated floodplain: Kramer’s Junkyard, 11 Old South Avenue is located with the FEMA-designated 100-Year floodplain (i.e., Flood Zone AE).

8) **Letter from the State or Tribal Environmental Authority:** A letter from Connecticut Department of Energy and Environmental Protection is attached.

Sincerely,

A handwritten signature in black ink, reading "Laura R. Hoydick". The signature is written in a cursive, flowing style with a large initial "L".

Laura R. Hoydick, Mayor  
Town of Stratford, Connecticut

November 26, 2019

Ms. Kelly F. Kerrigan  
Environmental Conservation Superintendent  
Town of Stratford  
550 Patterson Avenue  
Stratford, Connecticut 06614

Re: State Acknowledgement Letter for EPA Brownfields Assessment Grant for FY 20

Dear Ms. Kerrigan:

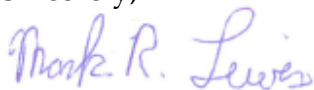
The Connecticut Department of Energy and Environmental Protection (DEEP) acknowledges that the Town of Stratford intends apply to the US Environmental Protection Agency (EPA) for a Brownfields Assessment Grant for Federal Fiscal Year 2020. The Town of Stratford plans to use the grant funding to conduct assessments at various properties contaminated with hazardous substances and petroleum in the Town of Stratford.

If petroleum assessment grant funds are awarded by EPA, DEEP or EPA must determine the eligibility of each petroleum site before any site specific assessment activity is undertaken using the petroleum assessment grant funds.

You may want to refer to DEEP's PREPARED Municipal Workbook. This on- line guidebook is designed to help municipalities navigate the complex process of remediating and redeveloping brownfields. The Workbook is available on our web site at  
[http://www.ct.gov/deep/cwp/view.asp?a=2715&q=555770&deepNav\\_GID=1626](http://www.ct.gov/deep/cwp/view.asp?a=2715&q=555770&deepNav_GID=1626).

If you have any questions about this letter, please contact me at (860) 424-3768 or by e-mail at [mark.lewis@ct.gov](mailto:mark.lewis@ct.gov). Good luck with your application.

Sincerely,



Mark R. Lewis  
Brownfields Coordinator  
Office of Constituent Affairs & Land Management

C: Ms. Dorrie Paar, EPA (via e- mail)

## 1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

### a. Target Area and Brownfields

#### i. Background and Description of Target Area

The Town of Stratford is located in Fairfield County, Connecticut, on the shores of both Long Island Sound and the Housatonic River. The town is sixty miles northeast of New York City and is adjacent to the east of Bridgeport, Connecticut. Stratford, located within the Greater Bridgeport Region, is traversed by three major highways (Interstate-95, the Merritt Parkway, and Route 8), and has the final (i.e., easternmost) stop in Fairfield County on the heavily utilized New Haven line of Metro-North Railroad.

Stratford's local economy was historically characterized by heavy industrial manufacturing and has been a center of the aviation and defense industry within the region, state, and nation. As the birthplace of the American helicopter industry, Stratford has been home to Sikorsky Aircraft, the world's leading helicopter manufacturer, since 1923. The now-defunct US Army Engine Plant (selected for closure under the Department of Defense Base Realignment and Closure program) and Raymark Industries (an EPA Superfund Site), however, serve as stark reminders of the fall of the defense and manufacturing industries in Stratford. A 1959 Chamber of Commerce brochure on Stratford's industrial and manufacturing businesses listed no fewer than 90 establishments that supported the Town's largest defense and manufacturing industries via production of boats, machine tools and parts, electrical products, iron and steel forgings, rubber products, and mold castings. When the Army Engine Plant, Raymark Industries, and other large manufacturers closed, the supporting businesses soon folded, causing the local economy to suffer.

The former manufacturing businesses are generally located within two distinct target areas and will be a focus of the proposed assessment program. One target area is Stratford's South End community, which is also identified as an Environmental Justice Community by Connecticut Department of Economic and Community Development (DECD). This indicates that at least 30% of this community's population is living below 200% of the federal poverty level. The South End Community contains the majority of industrial properties cited in the Town's prioritized list of brownfields, which was completed in 2012 through an EPA Brownfields Assessment Grant. This area is further overlapped by the federally-designated Opportunity Zone. The second target area is the Town's Transit Oriented Development District (TODD), which encompasses a 1 mile radius around the Metro-North train station. Together, these target areas comprise the most densely populated and economically disadvantaged neighborhoods in Stratford. The contaminated properties within the target areas are barriers to economic revitalization and improved quality of life for residents.

#### ii. Description of the Priority Brownfield Sites

The Town has identified several targeted Brownfield sites, with priorities including Kramer's Junkyard, Contract Plating, and Carpenter Technologies.

One priority brownfield property located within the South End Community Target Area, Environmental Justice Community, and Federal Opportunity Zone is known as Kramer's Junkyard. Totalling 0.86 acres, the junkyard comprises two adjacent parcels 11 Old South Avenue and Sunset Avenue. This former commercial/industrial site for used auto parts and autobody, sales, crushing, and storage was identified as a high priority for remediation on the Town's prioritized list of brownfields. Under RCRA, the property is identified as a hazardous waste generator or storage, disposal and/or transportation facility. Furthermore, the site has a history of spills reported to CT DEEP, with the most recent event in early January 2019. The 11 Old South Avenue parcel was acquired by the Town through tax foreclosure in August 2019, while the

Sunset Avenue parcel remains under private ownership. Due to the reports of hazardous materials and oil spills on site, the Town would make use of both the hazardous and petroleum assessment funding being requested through this application. The Town is currently leveraging other funds through Metropolitan Council of Governments (MetroCOG), in order to conduct a Phase I Environmental Site Assessment on the property. However, due to the observation of oily sheens and other obvious evidence of contamination, it is highly likely that this site will need additional assessment funds.

The Town has been actively engaged in the assessment and clean-up of the former Contract Plating Facility, located at 540 Longbrook Avenue. This parcel is located within the TOD district, with easy access to many modes of public transportation. Following site use by Contract Plating, the Good Earth Tree Company utilized the property for mulch and wood waste storage and processing, in addition to associated heavy machinery and equipment storage. The Town utilized approximately \$80,000 in US EPA Assessment funds to assess the majority of the property, in addition to approximately \$2.5 million dollars in funding leveraged from DECD for select remedial action. However, the area occupied by the Good Earth Tree Care Company was inaccessible during this time. The equipment has now been removed from the site, and the Town seeks funds in order to investigate these areas.

Another priority site is a 17-acre parcel of land, Carpenter Technology. The property has sat undeveloped for many years, following the closure of a slag landfill on the property. Known or perceived environmental contamination has resulted in the site languishing on the market. The town has performed a Phase I Environmental Site Assessment on the property out of its own funds, in order to aid in the process. The findings of this Phase I ESA concluded that a Phase II should be conducted on the property in order to assess potential fill areas of unknown source and environmental quality.

## **b. Revitalization of the Target Area**

### **i. Redevelopment Strategy and Alignment with Revitalization Plans**

Assessment of prioritized sites in the South End, TOD, and Opportunity Zone will launch area-wide economic development in two heavily-industrialized sections of Town that have suffered from the exodus of Stratford's manufacturing base. As outlined in the Town's Plan of Conservation and Development (updated 2013), a major goal is to put industrial properties back in to use in the South End. The Town's Transit Centered Development Feasibility Study (2010) cited the presence of brownfields in the TODD as a major impediment to redevelopment around the train station.

### **ii. Outcomes and Benefits of Redevelopment Strategy**

Economic benefits of continuing the Brownfields Assessment project and redevelopment of the target areas include:

- **Removal of brownfield barriers in the TODD and Opportunity Zone** to promote mixed-use and higher density residential development, including more affordable housing;
- **Helping to create opportunities for jobs.** Brownfields projects can potentially create temporary and permanent jobs in the environmental, construction, commercial, and retail sectors;
- **Returning contaminated, vacant properties to the tax rolls.** Restoring Brownfields to the grand list will bring in millions more of taxable properties that will help prevent harmful budget decisions that could lead to layoffs.

Non-economic benefits of continuing the Brownfields Assessment project and Redevelopment of the target areas include:

- **Contributing to greater access to the Town's Greenway Plan.** The Town is managing over \$2.5 million in state and federal funding to construct a waterfront Greenway along the Housatonic River, linking Stratford Center and the TODD with the South End/Opportunity Zone. Approximately one-half mile (in the South End, north of the mouth of the river) has been completed to date. Brownfields redevelopment could provide opportunities for Greenway connections all the way from the mouth of the river at Stratford Point, through the South End, and north towards Stratford Center. Portions of one of the targeted sites would remain as open space (i.e., tidal marsh), should the property be deemed environmentally suitable following assessment.
- **Promoting smart growth principles.** Redevelopment of old, vacant industrial sites within the TOD, Opportunity Zone, and Environmental Justice Community may prompt abandonment of new development on properties with high natural resources value, or on publicly-accessible waterfront.
- **Protecting water quality of stormwater discharge in to local watercourses (and ultimately Long Island Sound).** Redevelopment of brownfields in the target areas will greatly reduce the probability of illicit discharges from the properties in to the Town's storm sewer system (MS4). Updated environmental regulations (i.e., a stricter CT DEEP-issued MS4 Permit) that were not in place during the initial development of these blighted properties will now govern future development on site, and ensure that construction is environmentally responsible and sustainable.

#### c. **Strategy for Leveraging Resources**

##### i. Resources Needed for Site Reuse

Brownfields funding from the EPA has and will continue to stimulate the availability of additional funding from agencies such as the CT Department of Economic and Community Development (DECD) and CT Metropolitan Council of Governments (MetroCOG). Both agencies run active brownfields redevelopment programs and have awarded the Town's Brownfield Program with over \$4 million in funding to assess and clean up brownfields sites. Some of these sites (e.g., Contract Plating, Mercer Coal Towers) had first been assessed through a community-wide EPA Brownfields assessment grant. As additional sites are assessed via the requested EPA grant, the Town will seek funding for continued assessment and cleanup from DECD and MetroCOG. The Town is currently working with MetroCOG to obtain funding to a Phase I Environmental Site Assessment of the Kramer's Junkyard property at 11 Old South Avenue. This Phase I ESA would provide a springboard into subsequent assessment should funding be obtained by EPA. The Town has also applied for aid through the CT Brownfields Initiative Municipal Assistance Program (MAP), in order to obtain an updated Brownfields Inventory. Seeking developers during the assessment has also become a priority for the town. Obtaining a plan for development and incorporating that into the site's remedial action plan allows for cost-savings and redevelopment assurance.

##### ii. Use of Existing Infrastructure

The Town will encourage the use and upgrading of existing infrastructure, such as utilities, storm sewers, and even recycling of existing building materials (where practical), during redevelopment of assessed properties. Where existing infrastructure is insufficient (e.g. the development requires more capacity for storing storm water on site), the Town will encourage redevelopment with green infrastructure (e.g., porous pavers/pavement, green roofs, rain gardens, retention ponds).

## 2. **COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

### a. **Community Need**

#### i. The Community's Need for Funding

The Town of Stratford currently does not have the finances to sustain a Brownfields program, and the ongoing assessment work, internally. The Town's resources are often put toward other priorities such as public works, public safety, and education. The Town often experiences regular flooding due to its low elevation above sea level, and especially in conjunction with major storm events such as Hurricane Sandy or Tropical Storm Irene, which are arriving with increasing frequency and intensity. Stratford features 16 miles of tidally-influenced coastline along Long Island Sound and the Housatonic River, with many of its residents and approximately two-thirds of its commercial properties in area where the ground surface elevation is just a few feet above high tide. Therefore, the Brownfields program has been supported, in part, by \$900,000 of EPA Brownfields Assessment grants since 2011. A small operating expense account, \$75,000, is provided by the Town to the Redevelopment Agency (RDA; a Town commission). This budget is primarily used to support change orders for the various brownfields assessment and cleanup work when a project would otherwise stall until additional funding could be acquired. It is essentially used as an emergency fund.

ii. Threats to Sensitive Populations

1) Health or Welfare of Sensitive Populations

In addition to the presence of contaminated sites, Stratford's proximity to major transportation thoroughfares and energy plants also impacts the public's health. Target Areas (i.e., South End, TODD, Environmental Justice Community, Opportunity Zone) south of Barnum Avenue are adjacent to the I-95 corridor, exposing those citizens disproportionately to air, land, and noise pollutants. These target areas are also some of the most economically disadvantaged portions of Stratford. Stratford is also located between two of the former "Sooty Six" coal-burning power plants in Connecticut- one to the west in Bridgeport and one to the east in Milford. While these plants have since turned to more environmentally sustainable fuel sources (e.g., natural gas), the legacy of air pollution from coal-based pollutants remains within the health of Stratford's residents. While the exact impact of the presence of brownfields on Stratford's most vulnerable populations has yet to be assessed, we know from general public health data that Stratford residents suffer from those illnesses and diseases most associated with environmental contamination.

2) Greater than Normal Incidence of Disease and Adverse Health Conditions

***Blood Lead Levels in Stratford's Children:*** According to the Stratford Health Department's Lead Program, nearly 90% of Stratford's housing stock was built prior to 1978, and 80% of family day care homes are also pre-1978 construction. There is concern that a high number of Stratford's children are at risk of being exposed to lead paint and lead dust in their homes, yards, and day care settings. Stratford Health Department data shows that from January 1, 2012 through December 31, 2018, 98 children under the age of 6 have been identified with blood lead levels that merited Health Department intervention.

***Cancer in Stratford:*** Between 2000 and 2003, nearly 1,500 cases of invasive cancers were diagnosed. Cancers documented included all non-lymphoma cancers, including cancers of the lung, cervix, colon-rectum, skin, prostate and breast. Studies conducted in the late 90's indicate a possible connection between an increase in female bladder cancer rates in the mid-1980's and the presence of a minimum of six Stratford-based electroplating companies. Cancer of the bladder has been shown to be elevated among certain occupational groups including those who handle manufacture dyes, aromatic amines, leather, rubber, and aluminum. Among women, the occupations found at greatest risk included metal working and chemical processing.

***Obesity:*** According to a 2006 survey conducted by the Stratford Health Department, approximately 59% of adult Stratford residents reported being either overweight or obese. Poor nutrition is one culprit for the obesity epidemic. In South End, more than 90% of parents reported their children (aged birth to 8) were eating fast food at least once a week. This can be

attributed, in part, to the lack of high-nutrient, low calorie food sources in the South End: the community has no supermarket or larger grocery stores where fresh produce and non-processed food items can be purchased. It is anticipated that one of the targeted Brownfields in the South End and Opportunity Zone may be redeveloped into a grocery store.

3) Economically Impoverished/Disproportionately Impacted Populations

Based on 2000 U. S. Census statistics, Census Tract 804 in the Town's South End (a Target Area) is distinguished as the poorest and neediest census tract within Stratford. Its median household income in 2017 of \$45,881 is the lowest of all 12 census tracts in Stratford and was 37% lower than the median household income for Stratford as a whole. This grant will aid in redevelopment of these vacant parcels, bringing new growth and job opportunities to residents nearby.

**b. Community Engagement**

i. Community Involvement

**List of Project Partners:**

- Kelly F. Kerrigan, [kkerrigan@townofstratford.com](mailto:kkerrigan@townofstratford.com), 203-385-4006  
Conservation Superintendent, Town of Stratford Public Works  
Brownfields Program Manager for the Town of Stratford. Will serve as chief liaison with environmental consultants and State Licensed Environmental Professionals (LEPs) hired for site assessments.
- Mary Dean, [mdean@townofstratford.com](mailto:mdean@townofstratford.com), 203-381-1351  
Director of Economic Development, Town of Stratford Economic Development  
Plays an active role in establishing priority sites for assessment, and stimulating developer interest in assessed properties for redevelopment
- George Perham, [GPerham@Antinozzi.com](mailto:GPerham@Antinozzi.com)  
Chair, Town of Stratford Redevelopment Agency  
The agency will provide feedback on site prioritization and actively advocate to Town Council for redevelopment of assessed sites.
- Andrea Boissevain, [aboissevain@townofstratford.com](mailto:aboissevain@townofstratford.com), 203-385-4090  
Health Director, Town of Stratford Health Department  
Monitors contaminated sites. The Town Health Department's relationship with CT Department of Environmental Health and the CT Department of Public Health will play an important role, as the Town will utilize them in an advisory capacity to determine courses of action in handling contaminants of concern identified through the project.
- Mark Lewis, [mark.lewis@ct.gov](mailto:mark.lewis@ct.gov), 860-424-3768  
Brownfields Coordinator, Connecticut Department of Energy & Environmental Protection  
The Town routinely works with the CT DEEP on brownfields projects. The Town will formally notify DEEP prior to beginning any brownfield activity under the requested grant, and will actively seek out DEEP's input on regulations, procedures and processes pertaining to brownfields assessment, remediation, and redevelopment.
- Matt Fulda, [mfulda@ctmetro.org](mailto:mfulda@ctmetro.org), 203-366-5405  
Executive Director, Metropolitan Council of Governments  
MetroCOG is a multi-disciplinary regional planning organization. Their role in this project will be to participate in site prioritization (especially as it pertains to the TODD) and provide assistance for leveraged funding.
- Donald Friday, [don.Friday@ct.gov](mailto:don.Friday@ct.gov), 860-270-8063  
Environmental Analyst, CT DECD Office of Brownfields Remediation & Development (CT DECD-OBRD)



Stratford's relationship with DECD-OBRD will be utilized to tap into additional sources of funding for assessment, clean up, and redevelopment opportunities. DECD has been involved in planning and promoting TOD in Stratford Center.

ii. Incorporating Community Input

The Town of Stratford utilizes a system of Town commissions, committees, and planning groups that advise the Mayor, relevant departments, and the Town Council on various issues of interest. The commissions make recommendations, provide citizen oversight, and generally promote civic participation on all aspects of Town activity. Appointed by the Mayor and approved by the Council, the Stratford community members that serve on these commissions, committees, and planning groups represent the interests of the Town and their communities.

This structure works well for the Town, and was utilized in forming the Town's Redevelopment Agency (RDA). The RDA, in conjunction with the Economic Development Department, has taken on a key role in community engagement for the Town's Brownfields Program. The RDA meets monthly and an update on the brownfields program by the Town's Conservation Superintendent is on each agenda. The members of the RDA review progress on brownfields assessment, remediation, and redevelopment. The RDA grants approval for acceptance of grants for the brownfields program and makes recommendations to Town Council on grant acceptance. Furthermore, the RDA plays an active role in deciding which sites should be prioritized for assessment and remediation. Again, these recommendations are provided to Town Council for final approval. The RDA meetings and Town Council meetings are open to the public and time is allotted for a public forum at each. Citizens are welcome to express their thoughts, concerns, or agreement with proposed plans for a specific brownfield site. Town Council meetings are recorded and aired on a local cable access government channel. Thus, residents of Stratford have ample opportunities to learn about and discuss the brownfields program. These avenues of public engagement will continue for any future assessment activities.

Moreover, the Economic Development Department currently works with Council members that have active brownfields remediation taking place within their districts, to keep them apprised of concerns at the district level. For the Town's remediation of a former plating site (i.e., Contract Plating) and a former elementary school (i.e., Center School), district councilmen have been engaged to disseminate information on the remediation and redevelopment of subject properties. Community meetings are organized, and attendees have the option to provide their contact information to receive email updates on the progress of a given brownfield redevelopment. The Town's Health Department has also launched websites for the redevelopment for certain brownfields. The websites are frequently updated with project timelines, foreseen and unforeseen changes in scheduling, and health data (e.g., air monitoring) pertinent to the project. The Town, with the Health Department specifically, has decades of experience stemming from community advocacy efforts throughout the Raymark Superfund site's history. The meetings, emails, and websites all provide the Town with a means to solicit and respond to community concerns. Additionally, a repository of all documents pertaining to brownfields redevelopment (i.e. assessment reports, remedial action plans, progress reports on site redevelopment) are made available by the Town's Conservation Superintendent. Periodically, the repository is also updated at Stratford's Public Library. Residents may review items in the repository and solicit comments and feedback from relevant Town departments on any brownfields project.

### **3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

**a. Description of Tasks and Activities**

- *Task 1, Year 1: Community Prioritization Process and Site Inventory (with Particular Focus on Town-owned Properties in Target Areas or Publicly Utilized Properties)*

- Under the Town's 2011 EPA Brownfields Community-Wide Assessment grant, approximately 45 sites were classified as medium to high priority sites for brownfields assessment and redevelopment. Location within the Target Areas (South End, TODD) was taken in to account for the prioritization. About a half dozen of these sites were assessed and stand in various stages of assessment, remediation, or redevelopment (by the Town or developer). The remainder of the sites, and additional sites that may now be identified should be included in an updated site inventory. The prioritization of sites should also be reassessed to include current conditions, redevelopment, and strategic planning that have taken place in the target areas since the previous prioritization. For example, although Kramer's Junkyard in the South End was identified previously as a priority site, it was under private ownership at the time; now, it is owned by the Town through tax foreclosure. Being owned by the Town makes it feasible and prudent for the Town to focus assessment and remediation efforts on the property.
- The revisions and updates to the community-wide prioritization will be completed by an LEP that is currently on the Town's short-list of firms qualified for Brownfields work. Through a competitive RFQ process in 2018, the Town chose seven firms to handle various aspects of brownfields investigations and redevelopment. Requests for proposals and pricing on the community-wide prioritization will be solicited from the pool of seven firms. The Town's Conservation Superintendent, Economic Development Director, and RDA will choose a firm for the community-wide prioritization based on the quality of the proposal and competitive pricing.
- Additionally, the Conservation Superintendent has applied for aid through the Connecticut Brownfields Initiative (CBI) for the Spring 2020 Municipal Assistance Program (MAP). The Town sought support in creating an updated Brownfield inventory, which would include detailed lists and geographic information systems (GIS) maps. Should the town be awarded this assistance, EPA grant money could be utilized on other assessment activities, as detailed below.
- *Task 2, Year 2: Site Environmental Assessments*
  - As described above, the Town has a short-list of seven prequalified firms to perform brownfields-related work. In the competitive RFQ process through which these firms were chosen, pricing estimates were provided for Phase I, II, and III environmental site assessments, quality assurance project plans (QAPPs), and hazardous building materials investigations (HBMs). Based on the pricing estimates for each action and availability, the Town will draw on the pre-qualified LEPs to conduct assessment activities at four to six priority sites (depending upon level of contamination and budget). The results of the Phase I assessments will determine how many and which properties can proceed to Phase II and III assessments funded by the grant. Findings from the assessment work will be shared with the RDA, relevant Town departments and commissions, and all project partners, to inform them of the extent of the remediation issues at each assessed site. With input from all stakeholders, the Town will develop a coordinated effort to plan the cleanup of chosen properties.
- *Task 3, Year 3: Cleanup Planning*
  - After the Town has identified properties for remediation and redevelopment, cleanup planning will begin. Efforts will be coordinated among the project stakeholders (both within the Town and outside project partners) and the Town's selected environmental consultant to design a cleanup plan that will address the environmental hazards of the property and ensure that post-cleanup, the site is economically attractive for redevelopment. Robust plans for site cleanup, prepared in conjunction with the end-user in mind, will enable the Town to leverage funding from EPA, DECD, and MetroCOG for remedial activities in the future.

## **b. Cost Estimates and Outputs**

<b>HAZARDOUS</b>		<b>Project Tasks (\$)</b>			<b>Total</b>
<b>Budget Categories</b>		Prioritization/Inventory	Assessments	Cleanup Planning	
<b>Direct Costs</b>	Personnel				
	Fringe Benefits				
	Travel	\$1,500			\$1,500
	Equipment				
	Supplies			\$500	\$500
	Contractual	\$35,000	\$139,000	\$24,000	\$198,000
	Other				
<b>Total Direct Costs</b>		<b>\$36,500</b>	<b>\$139,000</b>	<b>\$24,500</b>	<b>\$200,000</b>
<b>Indirect Costs</b>					
<b>Total Budget</b>		<b>\$36,500</b>	<b>\$139,000</b>	<b>\$24,500</b>	<b>\$200,000</b>

<b>PETROLEUM</b>		<b>Project Tasks (\$)</b>			<b>Total</b>
<b>Budget Categories</b>		Prioritization/Inventory	Assessments	Cleanup Planning	
<b>Direct Costs</b>	Personnel				
	Fringe Benefits				
	Travel	\$1,500			\$1,500
	Equipment				
	Supplies			\$500	\$500
	Contractual		\$40,000	\$8,000	\$48,000
	Other				
<b>Total Direct Costs</b>		<b>\$1,500</b>	<b>\$40,000</b>	<b>\$8,500</b>	<b>\$50,000</b>
<b>Indirect Costs</b>					
<b>Total Budget</b>		<b>\$1,500</b>	<b>\$40,000</b>	<b>\$8,500</b>	<b>\$50,000</b>

- *Hazardous Cost Estimates*
  - *Prioritization/Inventory:* \$1,500 travel is for attendance of 2-3 town employees at brownfields related training conferences. \$35,000 contractual is the cost estimated from the Town's previous brownfields prioritization and site inventory completed in 2012. Should the town leverage aid from the Connecticut Brownfields Initiative Municipal Assistance Program (MAP) in preparing the revised and updated inventory, these funds will be utilized for assessment and/or clean-up planning.
  - *Assessments:* \$139,000 contractual is the estimated cost of completing the full suite of environmental assessments (Phase I, II, & III ESAs, QAPP, Hazardous Building Materials Investigation, and additional analytical costs) for four sites. The estimate is based on pricing provided by the Town's seven short-listed environmental firms.

- *Cleanup Planning*: \$500 supplies is for public outreach (i.e. meetings, flyers, pamphlets) to gain citizen insight in to what they ultimately desire for the cleanup and redevelopment of assessed sites. \$24,000 contractual is for remedial action planning by the Town's selected consultant. The estimate is based on four sites and pricing provided by the Town's seven short-listed environmental firms.
- *Petroleum Cost Estimates*
  - *Prioritization/Inventory*: \$1,500 travel is for attendance of 2-3 town employees at brownfields related training conferences.
  - *Assessments*: \$40,000 contractual is the estimated cost of completing the full suite of environmental assessments (Phase I, II, & III ESAs, QAPP, Hazardous Building Materials Investigation, and additional analytical costs) for one petroleum site. The estimate is based on pricing provided by the Town's seven short-listed environmental firms with additional contingency for underground or above ground storage tank and soils assessment.
  - *Cleanup Planning*: \$500 supplies is for public outreach (i.e. meetings, flyers, pamphlets) to gain citizen insight in to what they ultimately desire for the cleanup and redevelopment of assessed sites. \$8,000 contractual is for remedial action planning by the Town's chosen consultant. The estimate is based on four sites and pricing provided by the Town's seven short-listed environmental firms.

#### **c. Measuring Environmental Results**

The expected long-term outcomes of the project include cleanup and redevelopment of Brownfields within the Town of Stratford. This is expected to reduce blight, improve environmental health, increase the tax base, prevent urban sprawl, and promote the overall economic growth of the Town in an environmentally responsible manner. Key outputs and outcomes, including the number of properties investigated with grant funding, areas preserved, jobs created, stakeholder groups involved, and additional relevant information will be tracked through the completion of the remediation and reuse of sites. The Town of Stratford intends to quantify the progress of achieving these expected project outcomes by conducting a Town-wide inventory of Brownfields and by prioritizing those sites for assessment based on stakeholder input and smart growth redevelopment potential.

The prioritized Brownfields list will focus on Brownfield properties that have the highest likelihood to achieve the Town's redevelopment goals for smart growth revitalization of the community. All of the information gathered during the development of the prioritized Brownfields list will be included in a database for management and mapping purposes. Information will be added to the database as assessments are completed including the remedial costs, end use, property values following redevelopment, jobs created, and tax revenues generated. Outputs and long-term outcomes will be tracked via the ACRES database, and submitted to the EPA project officer after the project has been completed. Additionally, monthly meetings of the Town's RDA and quarterly reporting to EPA will hold the Town accountable for completing tasks and expending funds in a timely and efficient manner.

### **4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

#### **a. Programmatic Capability**

##### **i. Organizational Structure**

Stratford's Brownfields program utilizes a multi-departmental structure to conduct activities and manage assistance agreements. Stratford has a qualified project team with years of experience in environmental conservation, remediation of contaminated properties, public health, economic development, grants management and fundraising. Mary Dean, Economic Development Director, will be responsible for interfacing with potential developers for re-use of prioritized brownfields sites. Ms. Dean is the Town's liaison to the Stratford Redevelopment Agency, and has played the lead role in cultivating developer interest in Stratford brownfield sites. Christopher Tymniak,

Chief Administrative Officer, will be responsible for interfacing with the EPA on cooperative agreement management and required reporting, as well as keeping the project team on track to achieve its stated deliverables and outputs. Kelly Kerrigan, Conservation Superintendent, will serve as Project Director. Ms. Kerrigan will interface with the project consultants and leverage other aid from MetroCOG, DECD, among others for remediation and cleanup. This brownfields team meets quarterly to discuss progress on all active brownfields projects, collect and share information, and prepare for reporting requirements.

ii. Acquiring Additional Resources

Should outside expertise be required, the Project Director will work with the Purchasing Department and the Office of the Chief Administrator to take the required steps to procure those services quickly and according to Town policy and procedure. This may include the use of a licensed environmental professional (LEP) or other contractor. The Town maintains a short-list of pre-qualified LEP firms that have going through a competitive RFQ process, from which to draw upon.

b. **Past Performance and Accomplishments**

i. Currently Has or Previously Received an EPA Brownfields Grant

1) Accomplishments

**2014 EPA Brownfields Clean Up Grant (\$200,000- Mercer Coal Towers; 10/1/2014-9/30/2017):** The Town submitted all quarterly reporting to the EPA. Demolition of the coal towers and other structures was been completed. Site is remediated and ready for development. Economic Development Department is seeking developers.

**2013 EPA Brownfields Community-Wide Assessment Grant (\$400,000; 10/1/2013-9/30/2018):** The Town used these funds to conduct environmental assessments at various brownfields that were on the Town's prioritized brownfields list (i.e., Peasley Products, Contract Plating, and Wade's Garage). Cleanup at Contract Plating is now ongoing through leveraged funding, although some assessment remains. Following complete environmental assessment of Wade's Garage, the site was sold to a developer who entered in to CT DEEP's Brownfield Cleanup Program to remediate and redevelop the site as a gas station and market. An employee in the Health Department working on Public Outreach for the Brownfields Program was also partially funded through this grant. Hazardous funding was completely expended. Approximately \$169,000 in petroleum funding could not be used as no town-owned sites were available for petroleum assessment at the time (due to comingling with hazardous materials).

**2011 EPA Brownfields Community Wide Assessment Grant (\$400,000; 10/1/11-3/31/16):** The Town exceeded the workplan deliverables for this agreement, including assessment activities at five sites, a prioritized brownfields list (~45 medium to high priority sites identified), and an area wide plan. All funding was expended, and all reporting was completed in a timely manner.

2) Compliance with Grant Requirements

The Town previously received two EPA Assessment Grants (2011 & 2013) and one EPA Cleanup Grant (2014). EPA was kept apprised of all work and project deliverables via timely completion of quarterly reporting and updates to the ACRES system. When projects were held up for various reasons (e.g., discovery of additional contamination, scheduling of consultants), the EPA Brownfields Project Manager was informed and project schedules were updated accordingly. The Town has new staff on-board with a renewed commitment to the Brownfields program. \$169,000 in petroleum funding on the 2011 grant could not be expended as no sites were available for petroleum assessment at the time (due to comingling with hazardous materials). Thus, the town is only requesting \$50,000 for petroleum presently, to assess Kramer's Junkyard.

## **Threshold Criteria- Town of Stratford, CT Community-Wide Proposal**

### **1. Applicant Eligibility**

Eligible Entity: The Town of Stratford is a “General Purpose Unit of Local Government” as defined in 40 CFR Part 31.

### **2. Letter from the State Environmental Authority**

Attached, following the project narrative, is a current letter from the Connecticut Department of Energy and Environmental Protection acknowledging our plans to conduct brownfields assessment activities, dated November 26, 2019.

### **3. Community Involvement**

The Town’s Mayoral and Council-appointed Redevelopment Agency (RDA), in conjunction with the Economic Development Department, has taken on a key role in community engagement for the Town’s Brownfields Program. The RDA meets monthly and an update on the brownfields program by the Town’s Conservation Superintendent is on each agenda. The members of the RDA review progress on brownfields assessment, remediation, and redevelopment. The RDA grants approval for acceptance of grants for the brownfields program and makes recommendations to Town Council on grant acceptance. Furthermore, the RDA plays an active role in deciding which sites should be prioritized for assessment and remediation. Again, these recommendations are provided to Town Council for final approval. The RDA meetings and Town Council meetings are open to the public and time is allotted for a public forum at each. Citizens are welcome to express their thoughts, concerns, or agreement with proposed plans for a specific brownfield. Town Council meetings are recorded and aired on a local cable access government channel. Thus, residents of Stratford have ample opportunities to learn about and discuss the brownfields program. These avenues of public engagement will continue for any future assessment activities.

Moreover, the Economic Development Department works with Council members that have active brownfields remediation taking place within their districts, to keep apprised of concerns at the district level. For the Town’s assessment and remediation of a former plating site (i.e., Contract Plating) and a former elementary school (i.e., Center School), district councilmen have been engaged to disseminate information on the remediation and redevelopment of subject properties. Community meetings are organized, and attendees have the option to provide their contact information to receive email updates on the progress of a given brownfield redevelopment. The Town’s Health Department has also launched websites for the redevelopment for certain brownfields. The websites are frequently updated with project timelines, foreseen and unforeseen changes in scheduling, and health data (e.g., air monitoring) pertinent to the project. The meetings, emails, and websites all provide the Town with a means to solicit and respond to community concerns. The Health Department has a strong history of community involvement, stemming from the beginning of the Raymark Superfund Site assessments decades ago. Additionally, a repository of all documents pertaining to brownfields

redevelopment is maintained by the Town's Conservation Superintendent. Periodically, the repository is also updated at Stratford's Public Library. Residents may review items in the repository and solicit comments and feedback from relevant Town departments on any brownfields project.

#### **4. Available Balance of Assessment Grants**

The applicant does not have an active assessment grant.

## **LETTERS OF SUPPORT FROM PROJECT PARTNERS**



November 26, 2019

Ms. Kelly F. Kerrigan  
Environmental Conservation Superintendent  
Town of Stratford  
550 Patterson Avenue  
Stratford, Connecticut 06614

Re: State Acknowledgement Letter for EPA Brownfields Assessment Grant for FY 20

Dear Ms. Kerrigan:

The Connecticut Department of Energy and Environmental Protection (DEEP) acknowledges that the Town of Stratford intends apply to the US Environmental Protection Agency (EPA) for a Brownfields Assessment Grant for Federal Fiscal Year 2020. The Town of Stratford plans to use the grant funding to conduct assessments at various properties contaminated with hazardous substances and petroleum in the Town of Stratford.

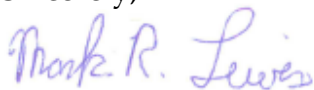
If petroleum assessment grant funds are awarded by EPA, DEEP or EPA must determine the eligibility of each petroleum site before any site specific assessment activity is undertaken using the petroleum assessment grant funds.

You may want to refer to DEEP's PREPARED Municipal Workbook. This on- line guidebook is designed to help municipalities navigate the complex process of remediating and redeveloping brownfields. The Workbook is available on our web site at

[http://www.ct.gov/deep/cwp/view.asp?a=2715&q=555770&deepNav\\_GID=1626](http://www.ct.gov/deep/cwp/view.asp?a=2715&q=555770&deepNav_GID=1626).

If you have any questions about this letter, please contact me at (860) 424-3768 or by e-mail at [mark.lewis@ct.gov](mailto:mark.lewis@ct.gov). Good luck with your application.

Sincerely,



Mark R. Lewis  
Brownfields Coordinator  
Office of Constituent Affairs & Land Management

C: Ms. Dorrie Paar, EPA (via e- mail)



November 27, 2019

Mr. Frank Gardner  
Brownfields Coordinator & Land Revitalization Coordinator  
Region 1  
United States Environmental Protection Agency  
5 Post Office Square, Suite 100  
Boston, Massachusetts 02109-3912

**RE: Town of Stratford – FY20 EPA Brownfields Assessment Grant Application**

Dear Mr. Gardner,

On behalf of the Connecticut Metropolitan Council of Governments, I submit this letter in full support of the Town of Stratford's application for a Fiscal Year 2020 EPA Assessment Grant.

The Town of Stratford is requesting \$200,000 in Hazardous Substances and \$50,000 in Petroleum funding to focus on the environmental assessment of the South End and the Transit Oriented Development District (TODD), two locally and regionally significant areas. Both the South End and the TODD have received a significant amount of local, regional and state interest and investment. More recently, we have been collaborating with the Town on the redevelopment of the former Center Elementary School and Complete Streets Improvements within the TODD in order to establish a better connection between the TODD and the South End via the Housatonic Greenway. FY19 Brownfields Assessment funding will continue the Town's momentum in assessing brownfield sites in and around these areas that will allow the Town to advance a greater range of transportation, employment and housing opportunities.

The Transit Oriented Development District, located in Stratford's Town Center and the South End were two of the Targeted Investment Areas included in MetroCOG's Community-Wide Brownfields Assessment Program, currently funded by the United States Environmental Protection Agency. Some of the region's most problematic brownfield sites are located within or adjacent the TODD and the South End. An investment from the United States Environmental Protection Agency will allow the Town of Stratford to build off our work done to date and will provide a means to continue site prioritization and assessment of brownfields these regionally significant areas and corridors.

The Town of Stratford's TODD and South End contribute significantly to the quality of life in the Greater Bridgeport Region. Additionally, the South End is home to the town's federally

designated Opportunity Zone and redevelopment in that area will provide a positive economic impact for the entire region. MetroCOG is committed to supporting the Town with any site prioritization and planning; and will coordinate with the town on programming our existing and future Brownfield funding to support these development goals. Additionally, we will assist with public outreach and community engagement, as needed. I respectfully request Environmental Protection Agency consider the numerous benefits that this funding will have for the Town of Stratford and the Greater Bridgeport Region.

Sincerely,

A handwritten signature in blue ink, appearing to read 'M. Fulda', with a stylized flourish at the end.

Matthew Fulda  
Executive Director

## Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

12/03/2019

**4. Applicant Identifier:**

Town of Stratford

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

Town of Stratford

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

**\* c. Organizational DUNS:**

0721344140000

**d. Address:**

**\* Street1:**

2725 Main Street

**Street2:**

**\* City:**

Stratford

**County/Parish:**

**\* State:**

CT: Connecticut

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

06615-5818

**e. Organizational Unit:**

**Department Name:**

Public Works

**Division Name:**

Conservation

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

Ms.

**\* First Name:**

Kelly

**Middle Name:**

F

**\* Last Name:**

Kerrigan

**Suffix:**

**Title:**

Environmental Conservation Superintendent

**Organizational Affiliation:**

Town of Stratford

**\* Telephone Number:**

203-385-4006

**Fax Number:**

**\* Email:**

kkerrigan@townofstratford.com

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Environmental Protection Agency

### 11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

### \* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-19-05

\* Title:

FY20 GUIDELINES FOR BROWNFIELD ASSESSMENT GRANTS

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

Community-Wide Brownfields Assessment to Redevelop Target Area

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="250,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="250,000.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: \* Signature of Authorized Representative:  \* Date Signed: